

This Portion contains the following comment letters:

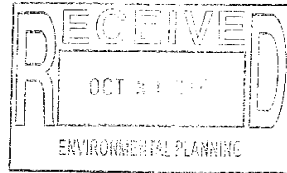
***Other Individuals***

Letter Y	David A. Wood	PR-171
Letter Z	Terry Thomas	PR-181
Letter AA	Theresa Acerro	PR-193

RESPONSE

October 29, 2005

Mr. Paul Hellman  
Environmental Projects Manager  
City of Chula Vista  
276 Fourth Avenue  
Chula Vista CA 91910



Dear Mr. Hellman:

The revised draft EIR recently was distributed with a section 5.17 Housing and Population providing a narrative about housing in Chula Vista for the years, 2005-2020. While it is nice to see some discussion about housing in the revised EIR when none at all appeared in the first draft EIR, the revision does not address some of the points I raised in my letter of February 12, 2005 (Attachment I) about the Housing section (or the lack thereof) in the first EIR.

My February 12 letter listed the following goals from the 1999-2004 Housing Element:

Goal 1: Conserve Existing Affordable Housing Stock

Goal 3: Ensure That an Adequate and Diverse Housing Supply is Available to Meet the City's Existing and Future Needs

Goal 4: Increase Home Ownership Opportunities for Low- and Moderate-Income Households

Goal 5: Enable Homeless Individuals and Families to Find Permanent Housing

Y-1

The letter went on to state that the 1999-2004 Housing element included an assessment of the city's success in meeting the goals in the Housing Element for the period immediately previous to the 1999-2004 plan and that a similar assessment for the 1999-2004 was missing from the draft plan for the 2005-2020 period. This assessment still is missing from the draft EIR. Why is this assessment necessary? Because it will give us a baseline for tackling one of the toughest and largest problems facing San Diego County and Chula Vista.

**There is a crisis in affordable housing in San Diego County.** The situation is worse than during the period covered by the plan up to 1999 and immensely worse than during the period 1999-2004. Attachment II points out that San Diego County is the second worst county in the U.S. in the ability of residents to buy a home. Attachment III

Y-1 See Responses to Comments M-2 and M-5.

RESPONSE

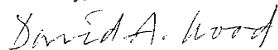
Y-2 shows that only 11% of County residents can buy a home, down from 17% as recently as a year ago. Chula Vista bears a responsibility, as do all cities and towns in this County, to acknowledge this problem and come up with concrete plans to address it. A first step for Chula Vista is an honest, straightforward, and public assessment of the Housing goals the city set for itself in 1999.

Y-3 Beyond that in Section 5.17 or somewhere in the EIR there should be specific definitions for the terminology "Low-..." and "Moderate-Income Households" and specific goals for these categories of residents. No such specific terminology and goals appears anywhere in the EIR and the present narrative of 5.17 gives the appearance that Chula Vista wants to paper over the city's responsibility with regard to the County's housing crisis and not do our part to resolve it.

Y-4 Chula Vista's record with regard to the amount of affordable housing available in the city in comparison with nearby cities in the County is not good (Attachment IV). The city geographically closest to us, National City, has almost four times the percentage of affordable housing units and the mayor of National City over a year ago announced plans to increase the amount of affordable housing in the city. In February, the city established a task force on affordable housing (Attachment V) and already the results have been dramatic. Within recent weeks the city has announced affordable housing initiatives targeted at two of the groups who should be of concern to any city: seniors and hospital workers (Attachments VI and VII). (Providing affordable housing for people who serve residents of Chula Vista should be of great concern. We shouldn't think that these people – our police and fire force, city staff, our health care workers, those who work in city commercial establishments, etc. – should only be here to serve us and not give any consideration as to where they have to live in order to do so...Tijuana, Imperial County, wherever. We should develop precise plans for where they can live in our city.)

Doing our part in Chula Vista to solve the affordable housing crisis in San Diego County is not going to be easy. But we must make a start by assessing our progress on the goals the city set in the past and come up with specific, measurable goals now which will guide us in the coming years.

Sincerely,



David A. Wood  
429 D Woodlawn Avenue  
Chula Vista

Y-2 This comment does not pertain to the adequacy of the dEIR. The comment, however, will be forwarded it to the appropriate City decision making body. Comment noted.

Y-3 The EIR does not address socioeconomic effects of the proposed project. According to Section 15131 of California Environmental Quality Act (CEQA), economic or social information may be included in an EIR or may be presented in whatever form the agency desires. However, Section 15131(b) limits the discussion of environmental impacts to physical changes in the environment. While the CEQA guidelines indicate that socioeconomic effects can be used to determine the significance of an impact, they are not to be considered as an environmental effect.

Y-4 This comment addresses the amount of affordable housing in Chula Vista and does not pertain to the adequacy of the dEIR. The comment, however, will be forwarded it to the appropriate City decision making body. Comment noted.

Attachment 2

RESPONSE

February 12, 2005

Mr. Paul Hellman  
Environmental Projects Manager  
City of Chula Vista  
276 Fourth Avenue  
Chula Vista CA 91910

Dear Mr. Hellman:

My comments on the Draft Environmental Impact Report (DEIR) for the Chula Vista General Plan Update (GPU) follow.

Y-5 The DEIR claims that this is "a comprehensive update of the City of Chula Vista General Plan" but it is not. It does not include the update of the the required Housing Element. (More on this later.) It does not reflect impacts from significant proposed projects such as Espanada. It also does not address the potential impacts of the Urban Development Corporation on resident and public input as a result of the elimination of three city committees providing planning and environmental oversight of development projects.

Y-6 The draft General Plan calls for an increase of over 100,000 people in the city by the year 2020 without any assessment of the impact of the plan on the displacement of people living in areas selected for redevelopment to meet this targeted population increase. One of the areas chosen for redevelopment under the "Urban Core Specific Plan" is Woodlawn and Colorado Avenues from G to H Streets, now containing 164 condominiums in the Holiday Gardens complex. The area is targeted for "Mixed Use Transit Focused Area" allowing buildings of eight plus stories with commercial, office, and residential uses. If the city's plans are realized, all the present homes in this area will be demolished and there are no city plans at this point where the present residents of Holiday Gardens could obtain nearby moderate income housing. Furthermore, the city also is pursuing a far more comprehensive effort under the "Urban Core" plan to eliminate all existing housing between E and H Streets and Interstate 5 and Broadway and replace it with four five-block long streets, many mid-block "paseos", a one block wide, five block long greenspace, and housing, which from all indications will be targeted at higher income residents. This plan, if implemented, will result in the loss of over 2,000 units of low and middle income housing. (Another 300+ units will be lost if the "Urban Core" plan for H Street to extend the Chula Vista Shopping Center to Interstate 5 is implemented.) The effect of eliminating this storehouse of affordable housing should be addressed somewhere in the EIR.

Y-7 While it is impossible to know what might be included in an up-to-date Housing Element covering the period starting in 2005 because it is not available, some Goals that were stated in the Housing Element that covered the period 1999-2004 bear mentioning because they relate to a problem that has increased enormously since that Housing Element was written: namely, the supply of affordable housing has diminished and the price of housing has escalated, making the purchase of a home out of the reach of all but a

Y-5 See Responses to Comments M-3 and M-5.

Y-6 The project will result in a substantial increase in population over the existing condition, and an increase in population over the currently approved plan. This is recognized in Chapter 7 of the EIR. As indicated in that chapter, the issues discussed in the analysis section of the document address the direct and indirect effects of this growth. Development of the land uses defined in the update would result in a substantial number of houses being displaced. Replacement of that housing, however, would not occur elsewhere, but would be provided within the same planning area. Similarly, displacement of people would not necessitate the construction of replacement housing elsewhere, outside of the planning area.

Y-7 See Responses to Comments M-3 and M-5.

small percentage of local residents. Those Goals from the 1999-2004 Housing Element were:

Goal 1: Conserve Existing Affordable Housing Stock

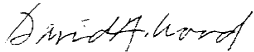
Goal 3: Ensure That an Adequate and Diverse Housing Supply is Available to Meet the City's Existing and Future Needs

Goal 4: Increase Home Ownership Opportunities for Low- and Moderate-Income Households

Goal 5: Enable Homeless Individuals and Families to Find Permanent Housing

The 1999-2004 Housing Element included an assessment of the city's success in meeting the Goals stated in the previous Housing Element. Because there is no up-to-date Housing Element in the draft GPU, we are not able to review the city's success in meeting the above goals. From all indications the situation with regard to the amount of affordable housing in the city deteriorated during this period. Because increasing the amount of affordable housing in Chula Vista should be a even larger focus of the city than when the plan for 1999-2004 was written, I suggest that consideration of the draft GPU and draft EIR be postponed until a new Housing Element covering the period starting in 2005 is ready for review and comment.

Sincerely,



David A. Wood  
429D Woodlawn Avenue  
Chula Vista CA 91910



**25.05 DOW JONES**  
Closed at 10,622.88



**1.24 NASDAQ**  
Closed at 2,090.00



**4.15 S&P 500**  
Closed at 1,180.00

# BUSINESS

## STOCK MARKET

### County 2nd-worst in U.S. for affording to buy home

Bottom 11 spots are all in California, survey shows

By Roger M. Showley, STAFF WRITER

San Diego County's high housing prices, coupled with its relatively low wages, make it the second-least-affordable area in the country, the National Association of Home Builders, or NAHB, reported yesterday.

In the Washington-based group's first "housing opportunity index" issued in nearly three years, the builders said San Diego County ranked 161st out of 162 markets surveyed, exceeded only by the Santa Barbara metropolitan area.

The index, which measured the percentage of households able to afford the median-priced

single-family home in the third quarter of last year, stood at 5.4 percent for San Diego. It was the lowest level recorded for San Diego by the builders in 12 years of tracking such figures.

The figure was based on a median price of \$470,000 for 23,006 new and existing home purchases analyzed for the July-September period, and a median household income of \$63,400.

Put another way, there were only 1,242 homes sold in that period within reach of the typical household.

Robert Rivinius, chief executive of the California Building Industry Association, noted that the index found California was home to the 11 least-affordable housing markets in the nation. And of the bottom 25 markets, 19 were

### Housing affordability varies

Among 162 metropolitan areas surveyed, highly variable housing prices and income different affordability levels, according to home sales by the National Association of Home Builders.

All figures for 3rd quarter 2004

#### MOST AFFORDABLE

	Housing opportunity index
Lima, Ohio	90
Saginaw-Bay City-Midland, Mich.	89
Lansing-East Lansing, Mich.	88
Canton-Massillon, Ohio	86
Youngstown-Warren, Ohio	86

#### LEAST AFFORDABLE

Santa Barbara-Santa Maria-Lompoc	4.1
San Diego County	5.4
Salinas	5.5
Los Angeles-Long Beach	6.1
Orange County	7.1

\* The housing opportunity index, or HOI, represents median income able to buy the median-priced home prevailing interest rate for a 28 fixed-rate loan, 10 percent devoted to housing.

SOURCE: National Association of Home Builders

SEE Housing, C4

Los Angeles Times

SUNDAY, APRIL 24, 2000 15M

## February affordability index

The percentage of households earning enough to buy a median-priced existing single-family home.

County	Median home price	Minimum income	Monthly payment*	Affordability index	Affordability a year ago
Los Angeles	\$473,550	\$109,831	\$2,746	17%	22%
Orange	663,600	153,909	3,848	11	17
San Diego	580,860	134,719	3,368	11	15
Riverside	369,814	85,771	2,144	16	27
San Bernardino	300,662	69,733	1,743	24	38
Ventura	632,320	146,655	3,666	15	22

\*Based on a 30-year mortgage with an average rate of 5.71% and 20% down payment, includes principal, interest, taxes and insurance.

Source: California Assn. of Realtors

Los Angeles Times

# H COUNTY OPINION



National City wants to address blight, especially along its commercial corridors. Roni Galgano / Union-Tribune photos

## Regional affordable housing comparison

City	Apartments	Senior	For sale	Section 8	Housing stock	Total affordable units (percent)
National City	1,316	534	15	1,044	15,422	19
Chula Vista	641	818	0	2,455	71,844	5.4
El Cajon	796	239	0	2,523	35,414	10
La Mesa	258	210	4	688	24,987	5
San Diego	6,307	3,141	4,177	12,043	489,000	5.2
Encinitas	108	13	0	136	24,901	1.1
Lemon Grove	76	232	0	464	8,765	8.8
Imperial Beach	15	99	0	419	9,784	5.4
<b>Totals</b>	<b>9,517</b>	<b>5,286</b>	<b>4,196</b>	<b>19,772</b>	<b>680,117</b>	<b>5.7</b>

SOURCE: SANDAG

**Can redevelopment can boost city services in indirect ways, right?**

When we increase the downtown retail base, that means that the national sales tax goes to the city.

When we build that hotel restaurant out there on 24th and I-15, that goes to the city.

and rehabilitation of apartment communities that are blighted, there are much more funding resources that we can go after, including the federal low income tax credit.

**What do you have planned for a themed cultural area, Filipino Village?**  
Filipino Village is on Plaza Boole-

celebrate this diversity, make it more of a regional attraction and unite this district. But Filipino Village is mainly putting window dressing to make it a unified district while parts of Highland Avenue are really blighted. We're going to improve the street and we're going to do building facade rehab and strengthen those local businesses. Already, we're beginning to see signs of interest on Highland Avenue similar to downtown in that developers are coming in and proposing mixed use projects, condominiums. Four- or five-story buildings over retail.

**Ten years from now, looking back what do you hope to have accomplished in redevelopment?**

The mayor and council have a very aggressive agenda. I like to think of it as revitalizing the city. When cities starting picking up their housing development in the '90s, we didn't. Not until less than a year ago did we start seeing new and new housing development. We're doing downtown, we're doing the Harbor District specific plans and planning along Plaza and Highland. So we're laying the



Union Tribune  
2/5/05

# SOU

## SAN DIEGO

### National City to get task force on housing

Affordable homes the  
aim of 20-member group

By Tanya Sierra  
STAFF WRITER

NATIONAL CITY — The Community Development Commission will appoint a 20-member task force to look for affordable housing options in National City, in response to public concern over city redevelopment.

The mix of community members, city officials and others will be called the Affordable Housing Task Force, said Community Redevelopment Director Ben Martinez.

The Community Development Commission gave the City Council an affordable housing action plan this week. It calls for creating a task force, improving the city's inclusionary housing strategy, updating the city's general housing plan, updating the redevelopment agency's five-year plan and improving the city's density bonus program, which helps create affordable housing with developer incentives.

The group will meet for up to six months before making a recommendation to the City Council, Martinez said.

"We're going to be looking at inclusionary housing ordinances that other cities have adopted," he said. "We

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# SOU

SAN DIEGO

Union Tribune 10/14/05

## Public loan in the works for housing proposal

Seniors complex given  
a boost in National City

By Tanya Sierra  
STAFF WRITER

NATIONAL CITY — City officials are planning to lend a private developer \$1 million to demolish a low-budget motel and build an affordable housing complex for seniors.

The developer, Willow Partners, is proposing 80 apartments at what is now the Ha'Penny Inn on East Plaza Boulevard. Construction could be completed by 2007.

National City's redevelopment commission has committed \$2.7 million to help build the project. Redevelopment agencies are required to set aside 20 percent of their income each year for affordable housing.

This week the city's Community Development Commission voted to lend Willow Partners \$1 million to prevent a delay in starting the project. The developer asked for the money because it narrowly lost a bid for federal tax credits this funding cycle.

Federal tax credits are incentives to attract private developers to build low-income housing. The state's Tax Allocation Committee doles out the credits twice a year.

In National City's case, Willow Partners, which has completed two senior housing projects in the state and has five others under construction, be-

FALL 2005

Union Tribune 10/5/2005

# SOUTH

SAN DIEGO COUNTY

## 96 town homes planned for hospital workers OK'd

By Tanya Sierra  
STAFF WRITER

NATIONAL CITY — Paradise Valley Hospital received approval last night to proceed with plans to build 96 town homes for employees of the medical center.

Despite some complaints from residents that the project is too dense, the City Council unanimously approved the housing development planned for Seventh Street and Arcadia Avenue.

Hospital employees will be

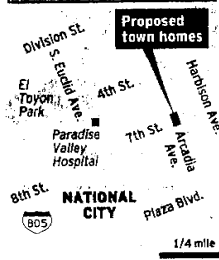
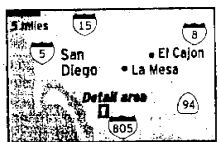
able to buy the town homes for about \$50,000 under market value, hospital CEO Alan Soderblom said.

"We have considerable interest from our employees," he said at last month's planning commission meeting.

Of the medical center's 1,400 employees, only 10 percent live in the city, Soderblom said.

If workers don't buy all 96 homes, the remaining ones will be available to the general public.

SEE Town homes, B4



PAUL HORN / Union-Tribune

TJ POLIC  
Fatal shooting of a  
may be related to seiz

INTERNI  
Woman gets one  
for selling nonexister

## High-rise in Chula

By Amy Oakes, STAFF WRITER

CHULA VISTA — A controversial condominium project proposed on Fourth Avenue has been

With the project known under consideration, Mayor Steve Boesche hopes the city's general plan will be amended.

Opposition to Españada heated, he said, that it became of the proposed general plan development for the next 30

"When you boil everything

To City Clerk

RESPONSE

Date: November 2, 2005

TO: City of Chula Vista City Council and Planning Commission  
C/o Ed Batchelder, Mayor Stephen Padilla, Jim Sandoval, Steve Powers

FROM: Terry Thomas, Former Member of Resource Conservation Commissioner  
And representative of the Environment Subcommittee (EOSSD) on the General  
Plan Update Steering Committee for the past three years (2002-2005).  
1996-September, 2005 and Professor Emeritus, Microbiology and Env. Biology  
terrytom@ix.netcom.com  
1339 Second Avenue, Chula Vista, CA 91911-4404

Submitted by Terry Thomas to compare/contrast recirculated dEIR GPU Oct 2005

Z-1

RE It had been stated by Steve Powers (GPU dEIR Environmental Administrator) and others that the RCC comments of the original dEIR GPU stated at their meeting of February 7, 2005, submitted to you here as an attachment, were not and WILL NOT be specifically responded to by the final or recirculated EIR. It is my determination that certain ones need to be responded to as a mitigation or response in the final EIR. Also, I have added other items from my review as a homeowner and long term resident of Chula Vista. Thank you for your careful consideration.

**KEY: Items listed and numbered originally from the RESOURCE CONSERVATION COMMISSION Meeting of February 7, 2005 and their RECOMMENDATIONS/ COMMENTS ON THE CHULA VISTA GENERAL PLAN UPDATE DRAFT EIR (EIR 05-01)**

Comments marked TT are my official comments and questions to the draft recirculated EIR for the Chula Vista General Plan Update and I officially request a response to these comments and questions. Thank you very much.

Z-2

1. Extend draft EIR public review period by 15 days.

TT Thank you for the recirculation of the draft EIR and extending the outreach to the community.

Z-3

2. Support the mandated use of green technologies with respect to municipal infrastructure and land use projects.

TT Still not mandated for City of Chula Vista Municipality projects. Although the City of Chula Vista has used solar technology in Police Dept and Civic Center. Needs to make greater commitment to things such as eliminating certain pesticides use, deconstruction to reduce solid waste. Greater incentives and penalties to use green technologies for water conservation and reclamation, source reduction of solid waste as a way of doing business, and energy choices.

Z-1

Comment noted. In accordance with Section 15088.5(f)(1), when an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and are not required to respond to those comments received during the earlier circulation period. In conformance with this section, the City is not responding to those comments received in response to the previous document. The City will respond to any comments that are submitted by the end of the public review period for the recirculated General Plan Update EIR.

Z-2

This comment does not pertain to the adequacy of the dEIR. The comment, however, will be forwarded it to the appropriate City decision making body. Comment noted.

Z-3

This is not a comment on the dEIR, but reflects the desire for the City to promote green technologies. The proposed General Plan Policy EE 7.6 demonstrates the City's commitment to promoting green technologies. Policy EE 7.6 states "Encourage the construction and operation of "green buildings," considering such programs as the Leadership in Energy and Environmental Design (LEED) Green Building Rating System."

PR-181

Could not the tree lighting, some new recreational and parking facility lighting be generated by solar energy?

- Z-4 3. Traffic impacts attributable to the unavailability of parking must be addressed in Transportation Demand Management plans for areas with traffic level of service "D" or worse, through options such as cell phone parking areas and low-cost, short-loop shuttles. Also, the responsibility of developers to provide parking structures may possibly mitigate other demands on community resources. Incorporate photovoltaic systems into parking structures to help mitigate air pollution.

**TT There is still not a shuttle proposal from Southwest Chula vista to the Marina Park area, Broadway, and H Street transit and E Street Transit loops. Shuttle presently proposed serves Urban core. Shuttle loops need to include the Palomar Station and Third Avenue/Palomar Transit area in the loop, especially on weekends when other services are limited or absent to that area. TT**

- Z-5 4. Incorporate SANDAG Congestion Management Program proposals as General Plan Update policies, including non-traditional strategies that focus on near-term, low-cost efforts such as transportation demand management (rideshare programs, transit pass subsidies, flexible work hours, telecommuting, etc.), transportation system management (signal synchronization, peak period parking restrictions, bicycle paths, etc.), and project design guidelines to encourage walking, bicycling, ridesharing, and transit use. These strategies, if used consistently and effectively, can help local jurisdictions better address new development impacts at the onset, reducing the need for more capital-intensive regional solutions in the future.

**TT Urban core Planning group also addressing this need. Need to get same amenities and basic needs in Southwest CV also. Shuttle, sidewalks, gutters, design review. There are still NO sidewalks or walkways on South part of Palomar Street near 5<sup>th</sup> Avenue. This needs to be part of General Plan mandate – the excuse that a future project will take care of this has been echoed for the years and we still have wheelchairs and children using the street to pass on that side of the street. The Healthy Neighborhood movement does address the need to enhance pedestrian and other mobility choices, so this need has taken on an even more urgent mode.**

Ordinances NEED to be enforced and incentives or initial grants provided during transition periods. More collaboration between Schools and City need to be made regularly and often. Schools must be mandated to open their parking lots in the evening for evening classes, community meetings, and recreational opportunities for the neighborhood and residents. Collaboration needs to be mandated in the General Plan and not rely completely on specific plans. Good example is ROP center on Second Avenue. Classes starting and ending at the same time create unnecessary congestion of cars looking for street parking. Parking areas on Castle Park campus should be available for this evening parking to facilitate the

- Z-4 A Transportation Demand Management plan (TDM) is not proposed as part of the General Plan Update. Parking is considered an issue associated with development of specific projects and zoning requirements. The General Plan notes that parking detail, both in kind-i.e., structured of surface parking-and in quantity-number of spaces per type of use, will be determined as part of the amendment to the zoning Ordinance necessitated by the adoption of the General Plan Update. This comment requests shuttle service from southwest Chula Vista to the Marina Park area, Broadway, and the H Street and E Street Transit loops. This comment does not pertain to the adequacy of the dEIR. Comment noted.

- Z-5 This comment requests the addition of policies that incorporate SANDAG's CMP proposals. It does not reference the adequacy of the dEIR. The comment, however, will be forwarded it to the appropriate City decision making body.

expansion of evening programs at this site. This is just an example that is repeated in other western Chula Vista areas.

5. More completely address the historical significance of Chula Vista's long-term industries (e.g., Salt Works, agriculture, railroad, military).

Z-6

**TT General Plan should support the Salt Works industry for its special and historical technological significance. It is an important part of our community industry character. Also, the area is significant in relation to the biological resources, habitats, and plays a role in the Pacific Flyway and natural history of the California tern and other organisms. This area would be great for Environmental Education site and also a controlled staging area for the Otay Valley Regional Park to facilitate the goals of the wildlife preserve and guidelines of the cognizant agencies such as Fish and Wildlife and State and local conservation groups to preserve, enhance, monitor, and maintain the unique and special habitats and special environment created by the marriage between nature and technology in this area. This would be a great spot for Environmental Education for all ages, degrees of exploration, ecotourism, and global significance. I would support this effort and would love to join others to contribute to its special success now and into the future.**

6. The need for a heritage house, an international house, and a museum housing local cultural and paleontological resources should be promoted now and established within the next 30 years.

Z-7

**TT The Otay Church in Southwest Chula Vista would be a great place for a Heritage and International House Museum. This would expedite reaching the goal for this recommendation. Also, it would be close to the Transit focus area for this Southwest area and would make another contribution to the International Theme of this area. The Paleontological resources currently going to the Natural History Museum would make a dynamite drawing point that would fit into various sites: Bayfront or Bird Ranch or Make a combo, Agricultural, Mining, and Paleontology museum at the site where Hanson is (when they move to Rock mountain) and link it to the OVRP projects. I have been advocating this for years and would be interested in facilitating it once there is a potential location and identified or donated site. TT**

7. Address environmental justice in the General Plan Update and EIR, using the Regional Comprehensive Plan as a model, including compliance with the following policies: Locate energy facilities, such as power plants and/or transmission lines, so that lower income and minority communities are not disproportionately negatively affected (Regional Comprehensive Plan, Chapter 6, page 380).

Z-8

**TT dEIR revisions and amendments have improved Environmental Justice items. Need improved compliance, restrictions and monitoring in established mixed-use neighborhoods, especially in reference to hazardous wastes, air pollutants, noise, and EMF radiation. Will certain kinds of**

- Z-6 The discussion of industrial history is recognized in the dEIR. Section 5.4.1.2 recognizes the Western Salt Works as an important historic resource in the city. The City understands that industrial historic resources may be important. In accordance with proposed General Plan Policy LUT 12-6, future projects are required to consider their potential impact of historic structures including industrial buildings and sites.

- Z-7 This comment discusses the need for a heritage house, an international house, and a museum housing local cultural and paleontological resources. This comment does not reflect on the adequacy of the dEIR. Comment noted.

- Z-8 The EIR does not address environmental justice. CEQA limits the discussion of environmental impacts to physical changes in the environment. While the CEQA guidelines indicate that socioeconomic effects can be used to determine the significance of an impact, they are not to be considered as an environmental effect.

industries be restricted in the port area or adjacent to infill residence projects. For example, no dry cleaning businesses using perchlorate, no car painting, no idling buses, certain kind of light restrictions, noise restrictions.

TT New proposed dEIR amendments Include 1000 feet away from Otay Landfill and current Bayfront power plant (from sensitive receptors and 500 feet away from major highway. Needs to be more restrictive in some areas and in reference to active recreation siting. For example, area below the bridge should not be used for high level recreational areas, since Carbon dioxide and carbon monoxide and other gases may pocket in that area. What are the plans for the area under the new 125 Bridge? What impact will they have on the MSCP, resources, and environment and sensitive receptors in general? How mitigated for noise, air, oil and grease, and water runoff pollution.

- A significant buffer zone of at least 1,000 feet should be mandated between past, present, and future waste sites that would impact on sensitive receptors both human and in nature that would result in morbidity, mortality, and well-being of the people and the natural resources and community welfare.
- TT Environmental Health advocates feels satisfied with dEIR language at this time. I personally would like to see greater than 1000 feet in some areas so do support a study to determine if greater than 1000 feet needed in some projects.
- Do not issue permits for certain types of industries, businesses, or operations that would impact the health of sensitive receptors.

TT Methyl bromide, perchlorate, metal plating industry, and certain other emitters must be restricted to location and some businesses of this type may need to be re-sited. Will they be? Will certain businesses be phased out in areas where residents are built up. I do not support the idea that an industry MAY have a toxic reduced technology in the FUTURE and so should get the permit NOW. Permits should be restricted on basis of current standards and technology in use and possible. Will it be?

8. Eco-tourism, environmental research and education, and economic and environmental sustainability need to be more comprehensively addressed.

Z-9 TT Great improvement in the recirculated EIR, but Economic Element does not do this area its due importance with respect to the GPU *per se*, especially in the area of ENVIRONMENTAL technology, ECO-tourism, Green technology and building industry, eco-marketing, ENERGY conservaton and bottom-line benefits.

9. Air quality health impacts of the South Bay Power Plant to Chula Vista should be addressed.

Z-10 TT To be more fully addressed by the Bayfront port district EIR also.

Z-9 This comment discusses the need to address eco-tourism, environmental research and education, and economic and environmental sustainability. CEQA limits the discussion of environmental impacts to physical changes in the environment. Comment noted.

Z-10 The potential for the placement of sensitive receptors in the vicinity of the South Bay Power Plant is addressed in the dEIR. Air quality impacts associated with the potential siting of residential uses within 1,000 feet of the plant is considered a significant adverse impact (Section 5.11.3.3). The power plant occurs in the Bayfront district of the city, outside the area of change covered by this document. The discussion in the dEIR indicates that while the nature of power generation on the Bayfront is speculative, it was "... assumed that an air quality effect could occur if sensitive uses are placed within 1,000 feet of the plant."

The plant is permitted by the California Energy Commission and is required to meet stringent air quality standards. The Air Resources Board publishes the results of the air modeling for regional sources of pollution including the power plant. That modeling indicates that there is a projected cancer risk of 2.2 increased cancers in 1,000,000 as a result of emissions from the plant, at the point of highest concentration. This is below the 10 in 1,000,000 standard used to assess a significant cancer risk. The report also indicates that the plant is below the threshold for acute and chronic health risk (APCD 2003).

In addition, the dEIR establishes a mitigation measure that insures that no residential use will be placed within this 1,000-foot region while these facilities are operating unless a health risk assessment demonstrates that there is no significant health risk.

## RESPONSE

- Z-11 10. The draft EIR lacks an analysis of pending EPA and CARB regulation of toxic air contaminants (e.g., mercury).
- Z-12 11. The draft EIR lacks an analysis of cumulative environmental impacts with respect to the Baja California/Tijuana region. **Although SANDAG is making inroads re this, Chula Vista needs to play larger role in the collaboration process. Will impact traffic, air pollution, economics, environment, public health and socio-cultural-educational opportunities, institutions, and quality of life. How are we considering the cumulative impacts in our region?**
- Z-13 12. The draft EIR needs to address socio-economic impacts that would result from physical changes to the environment. This needs to be better addressed in the dEIR especially with respect to housing, jobs, cultural arts, entertainment, mobility, jobs, and health/safety and fulfilling the GPU vision and goals TT Needs expansion re social impacts and mitigating resources, services, and amenities provided by the city and other agencies. How done?
- Z-14 13. The lack of certain potential mitigation measures that can reduce the significant unmitigated impacts of the proposed General Plan Update is problematic.
- TT Water was tested for the Otay River and ponds. I understand these were the standard coliform and mineral lab tests. Is this correct? Are there plans to also test the fish themselves to test for heavy metals (lead, mercury, etc.) and also for certain pesticides and organics that accumulate in the food chain. Will this be done?
- TT Traffic, transit, and parking needs to be better addressed in the Southwest Chula Vista Bridge over the Otay River needs better lighting and reflective markings. What mitigation measures to make OVRP available to mobility-challenged individuals? What safety and security measures.
- TT What would be the mitigation re feral cats or domestic cats in biological resource adjacent areas. Will the new residences restrict the type of predatory pets to mitigate impact on birds and Pacific flyway visitors?
- TT When testing for noise impacts on residences 500 feet or less away from highways and/or noisy all-night businesses, are you testing during the normal sleeping hours as well as the early morning and evening hours? What are the City's enforceable standards for noise pollution. If highway noise exceeds the standards, will a mitigation measure DEMAND that walls or other measures be made to reduce the noise impact on the residents, schools or other sensitive receptor cadres.
- Z-15 14. The Preferred Plan would obliterate Chula Vista's small town character. TT Much improvement by using the harmonizing concept and Community character focus and form based growth concepts, design and

- Z-11 The comment questions the analysis of toxic air contaminants, specifically mercury, from power plants and industrial air emissions. The dEIR addresses the Rohr Industries/BF Goodrich plant, the South Bay Boatyard, the South Bay Power Plant, Hanson Aggregates'/Nelson and Sloan, Marine Service Commercial Diving Company, the Otay Landfill, and the Costco Gasoline Facility that are monitored as sources of pollution (Section 5.11.3.3). These facilities are monitored by APCD for toxic air contaminants.
- Z-12 Cumulative impacts are not specifically assigned to Tijuana. To the extent that environmental conditions are a result of the contributions from Mexico, they are included in the baseline on which the impact analysis is based. For example, air quality monitoring at the Otay Mesa and Chula Vista monitoring stations include contributions from Mexico to the extent that they influence those ambient conditions. Similarly, traffic volumes on area roads do not distinguish between vehicle trips originating in the United States or Mexico. As such, modeled conditions reflect contributions from both countries.
- Z-13 The EIR does not address socioeconomic effects of the proposed project. CEQA limits the discussion of environmental impacts to physical changes in the environment. While the CEQA guidelines indicate that socioeconomic effects can be used to determine the significance of an impact, they are not to be considered as an environmental effect.
- Z-14 The comment states that the lack of potential mitigation measures to reduce the significant unmitigated impacts of the GPU is problematic. All mitigation measures deemed appropriate have been included in the dEIR.
- Z-15 This comment does not pertain to the dEIR. The comment, however, will be forwarded it to the appropriate City decision making body. Comment noted.



# RESPONSE

implementation approaches. Thank you very much for the improved harmonizing language, historical resources, MSCP, and low/middle rise standards. Please continue to improve on reducing social impacts, providing healthy resources and recreations for children, families, physically challenged, natural gifts and resources, and people of all ages, abilities, talents, resources, and heritage.  
***Small Town Character and Big Town Bounty blend very well with our Chula Vista Beauty, Home, and Neighborhood Focus.***

- Z-16 15. Unnecessary water and energy impacts should be avoided.
- Z-17 16. General Plan Update vision input is not reflected in the Preferred Plan, but is better reflected in other alternatives.
- TT Community Character alternative better served. However, some scenarios need to be addressed. Example scenario 2 permitting residences replacing MSCP land is not acceptable to the vision and the PROMISE of the mscp to preserve in perpetuity.**
- Z-18 17. Draft EIR, pages 32 and 55: The description and location of the Country Club View Property is inaccurate. Page 65 and Figure 3-4 might identify the correct location.
- Z-19 18. Draft EIR, page 156, Photograph 5.2-3: Caption should state that the view in this photograph is looking east rather than west. OK
- Z-20 19. Was the proposed deletion of Alta Road assessed with respect to the potential third Otay Mesa border crossing? **TT Please answer this.**
- Z-21 20. The statements on pages 297 and 525 of the draft EIR regarding traffic mitigation are inconsistent.
- Z-22 21. Draft EIR, Appendix B, GPU Maps: The school site located within the Interstate 5 Corridor District on E Street, between Broadway and I-5, is referred to as Feaster Elementary School on some maps and as Edison Elementary School on others. Fixed
- Z-23 22. **The draft EIR does not adequately address the environmental impacts associated with extending La Media Road across the Otay River; elaborate the reasons for this lack of analysis. TT Please do this by referring to impacts on MSCP long range.**
- Z-24 23. The draft EIR contains inconsistencies regarding building heights and densities. The relationship of building heights to densities, which are two separate issues, is not adequately addressed.

- Z-16 Energy and water supply impacts were considered significant because there is no contracted source of supply for these two resources, and there can be no means to identify the effort needed to supply that energy or water, and therefore, the effects of that provision.
- Z-17 These comments refer to the proposed General Plan Update. They do not reference the dEIR. The comment, however, will be forwarded it to the appropriate City decision making body. Comment noted.
- Z-18 The recirculated EIR was revised prior to public review to correct the description and location of the Country Club View Property. This comment does not address the adequacy of the EIR. Comment noted.
- Z-19 The recirculated EIR was revised to correct the caption on Photograph 5.2-3.
- Z-20 As discussed on page 12 of the Transportation Study, Alta Road was removed in order to be consistent with the East Otay Mesa Specific Plan, which also removes this facility. Analysis and implementation of an East Otay Mesa border crossing would need to be coordinated with the County, in whose jurisdiction the new crossing would be located.
- Z-21 The recirculated EIR was revised prior to public review. This comment does not address the adequacy of the dEIR. The comment, however, will be forwarded it to the appropriate City decision making body. Comment noted.
- Z-22 The recirculated EIR was revised prior to public review to correct the labeling of schools in the maps attached to the EIR as Appendix B. This comment does not address the adequacy of the dEIR. Comment noted.
- Z-23 Comment noted. See Response to Comment X-12.
- Z-24 The dEIR addresses the community character impacts that may result from the Preferred Project Alternative. As noted in the Summary section, Table 1-3 indicates that the Preferred Plan will increase massing height and intensity. These impacts are considered self mitigating because Objectives 47 and 48 establish measures that will avoid the effect.

# RESPONSE

- Z-25 24. The project objectives as stated in the draft EIR include the protection of stable residential neighborhoods; however, this objective is not supported by the Preferred Plan in certain locations.

**TT Certain Mobile Home Parks are stable residential neighborhoods. Do They get the same consideration as buildings.**

- Z-26 25. The absence of an update of the Housing Element is a deficiency since it would address mitigation of the displacement of residents.

**TT How is the displacement of residents addressed in the revised Housing Element and dEIR impacts. How is the mitigation and provisions to reduce the numbers of current and potential homeless residents and visitors situation addressed in the EIR GPU ? How are the homing displacement and subsequent begging by homeless problem addressed at the freeway exits and other locations throughout the city?**

- Z-27 26. The draft EIR does not address the consistency of the proposed General Plan Update with the Cummings Initiative and the impact of non-incremental zoning changes that would result from adoption of the General Plan Update.

**TT Please address this again. See 27, 28, 29 below.**

- Z-28 27. Include a new, updated Housing Element as part of the General Plan Update. The General Plan Update should be reviewed by the Chula Vista Housing Commission.

- Z-29 28. Include policies and options in the Housing Element that mandate community services that help facilitate average and below average income households to find affordable housing.

- Z-30 29. Recommend that full and complete relocation assistance be provided to enable displaced residents to obtain equivalent housing locally.

- Z-31 30. The description of the scenarios in the draft EIR is inadequate; it is not clear what the scenarios really are and what they really mean. The final EIR should clarify this. **TT Improved**

- Z-32 31. Clarify and quantify the reductions of impacts attributable to proposed mitigation measures that are identified in the draft EIR. **TT Still needs work to do this.**

- Z-33 32. Proposed Transit Focus Areas: **How can impacts be adequately addressed in the draft EIR if no height limit is specified for high-rise areas? Recommend a cap of 15 stories in high-rise areas. There is no adequate reason to designate the Third Avenue and 'H' Street area as a Transit Focus Area due to the present lack of enhanced transit service in this area and due to the proximity of this area to the historic downtown area; furthermore, this proposed Transit Focus Area is inconsistent with the results of the General Plan Update vision input. TT What does a transit study area really mean?**

- Z-25 These comments refer to the proposed General Plan Update. This comment does not reflect on the adequacy of the dEIR. The comment, however, will be forwarded it to the appropriate City decision making body. Comment noted.

- Z-26 Comment noted. See Response to Comment M-2.

- Z-27 The Cummings initiative was approved through Ordinance No. 2309 in 1988, and included in the Chula Vista Municipal Code as Chapter 19.80, Controlled Residential Development (CRD). The CRD Ordinance is a zoning-level mechanism to control the rate of development by limiting residential rezonings to not more than the next highest zoning classification (re R1 to R2) in a two-year period, along with other provisions to address non-residential to residential rezonings. While the CRD Ordinance is not at the General Plan level, zoning actions subsequent to the General Plan Update will need to comply with the terms on the Ordinance

- Z-28 Comment noted. See Comment M-2.

- Z-29 Comment noted. Page 573 of the dEIR discusses the Affordable Housing Program (AHP) included in the Housing Element. This program requires new projects involving 50 or more units to set aside a minimum of 10 percent of the project's units as affordable to low- and moderate-income households. The AHP, through its Implementation Guidelines, offers flexibility in meeting affordable housing goals by considering alternatives to actual developer built-in production. These alternatives include land set-asides, off-site projects, and in-lieu contributions.

- Z-30 This comment does not reflect on the adequacy of the dEIR. The comment, however, will be forwarded it to the appropriate City decision making body. Comment noted.

- Z-31 Each of the three scenarios are identified and described in the Project Description section (Chapter 3) of the dEIR. Tables 3-5, 3-6, and 3-7 represent the land uses designated for each scenario. Additionally, the map index contains maps of every scenario within each district.

- Z-32 Comment noted. Each section in Chapter 5, Environmental Impact Analysis, of the dEIR includes a conclusion after mitigation which provides analysis of the level of significance after mitigation.

- Z-33 These comments request specific changes in the proposed plan. They do not reference the dEIR. One recommendation is for the limitation of the height of high-rise buildings. Subsequent to the publication of the draft document, the City has amended the definition of a high-rise building to place a limit on the maximum number of stories, as requested. A second request is to change the "transit focus area" designation for the area near Third and H Streets, indicating that there are no SANDAG or Chula Vista plans for transit use at this location. The proposed update would establish this transit use at this location. It is part of the proposed action.

RESPONSE

**What are the standards for determining acceptable vs unacceptable alternatives (preferences based on GPU vision, goals, objectives? Or what?) What opportunity for general public to give input to the choices for this area and URBAN core and BAYFRONT areas?**

- Z-34 33. The proposed mitigation in the draft EIR for the demolition of historic structures is inadequate. **TT Historic preservation improved in recirculated dEIR and its amendments.**

- Z-34 This comment states that the proposed mitigation in the dEIR for the demolition of historic structure is inadequate. No specifics are provided. Comment noted.

Resubmit by Terry Thomas

These are the  
ORIGINAL ITEMS

**DRAFT**

**RESOURCE CONSERVATION COMMISSION  
RECOMMENDATIONS/COMMENTS  
ON THE**

**CHULA VISTA GENERAL PLAN UPDATE DRAFT EIR (EIR 05-01)**

**February 7, 2005**

To City  
Clerk

See my  
document  
of 11-2-05

1. Extend draft EIR public review period by 15 days.
2. Support the mandated use of green technologies with respect to municipal infrastructure and land use projects.
3. Traffic impacts attributable to the unavailability of parking must be addressed in Transportation Demand Management plans for areas with traffic level of service "D" or worse, through options such as cell phone parking areas and low-cost, short-loop shuttles. Also, the responsibility of developers to provide parking structures may possibly mitigate other demands on community resources. Incorporate photovoltaic systems into parking structures to help mitigate air pollution.
4. Incorporate SANDAG Congestion Management Program proposals as General Plan Update policies, including non-traditional strategies that focus on near-term, low-cost efforts such as transportation demand management (rideshare programs, transit pass subsidies, flexible work hours, telecommuting, etc.), transportation system management (signal synchronization, peak period parking restrictions, bicycle paths, etc.), and project design guidelines to encourage walking, bicycling, ridesharing, and transit use. These strategies, if used consistently and effectively, can help local jurisdictions better address new development impacts at the onset, reducing the need for more capital-intensive regional solutions in the future.
5. More completely address the historical significance of Chula Vista's long-term industries (e.g., Salt Works, agriculture, railroad, military).
6. The need for a heritage house, an international house, and a museum housing local cultural and paleontological resources should be promoted now and established within the next 30 years.
7. Address environmental justice in the General Plan Update and EIR, using the Regional Comprehensive Plan as a model, including compliance with the following policies:
  - Locate energy facilities, such as power plants and/or transmission lines, so that lower income and minority communities are not disproportionately negatively affected (Regional Comprehensive Plan, Chapter 6, page 380).

- A significant buffer zone of at least 1,000 feet should be mandated between past, present, and future waste sites that would impact on sensitive receptors both human and in nature that would result in morbidity, mortality, and well-being of the people and the natural resources and community welfare.
  - Do not issue permits for certain types of industries, businesses, or operations that would impact the health of sensitive receptors.
8. Eco-tourism, environmental research and education, and economic and environmental sustainability need to be more comprehensively addressed.
  9. Air quality health impacts of the South Bay Power Plant to Chula Vista should be addressed.
  10. The draft EIR lacks an analysis of pending EPA and CARB regulation of toxic air contaminants (e.g., mercury).
  11. The draft EIR lacks an analysis of cumulative environmental impacts with respect to the Baja California/Tijuana region.
  12. The draft EIR needs to address socio-economic impacts that would result from physical changes to the environment.
  13. The lack of certain potential mitigation measures that can reduce the significant unmitigated impacts of the proposed General Plan Update is problematic.
  14. The Preferred Plan would obliterate Chula Vista's small town character.
  15. Unnecessary water and energy impacts should be avoided.
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25. The absence of an update of the Housing Element is a deficiency since it would address mitigation of the displacement of residents.
26. The draft EIR does not address the consistency of the proposed General Plan Update with the Cummings Initiative and the impact of non-incremental zoning changes that would result from adoption of the General Plan Update.
27. Include a new, updated Housing Element as part of the General Plan Update. The General Plan Update should be reviewed by the Chula Vista Housing Commission.
28. Include policies and options in the Housing Element that mandate community services that help facilitate average and below average income households to find affordable housing.
29. Recommend that full and complete relocation assistance be provided to enable displaced residents to obtain equivalent housing locally.
30. The description of the scenarios in the draft EIR is inadequate; it is not clear what the scenarios really are and what they really mean. The final EIR should clarify this.
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historic downtown area; furthermore, this proposed Transit Focus Area is inconsistent with the results of the General Plan Update vision input.

33. The proposed mitigation in the draft EIR for the demolition of historic structures is inadequate.

(J:\Planning\RCC\2005\RCC Comments - GPU EIR)

RESPONSE

**Steve Power**

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**From:** Rabbia Phillip  
**Sent:** Tuesday, November 08, 2005 8:33 AM  
**To:** Steve Power  
**Subject:** FW: relocationGPU EIR  
**Importance:** High

-----Original Message-----

**From:** THERESA ACERRO [mailto:thacerro@yahoo.com]  
**Sent:** Sunday, November 06, 2005 2:39 PM  
**To:** Rabbia Phillip  
**Subject:** relocationGPU EIR

**AA-1** Rabbia, Could you please forward this to Steve Powers for me? Thank-you. Theresa  
Steve Powers,  
I sincerely hope that the issue of relocation will be dealt with in the FEIR for the GPU. It obviously is a community character issue. We have spent much time and energy talking about height as a factor of community character, but the ultimate community character factor is the people who live in a city. Displacement of the old, disabled, working poor, and other long time Chula Vista residents by new development in the west will have a profound effect upon the character of our city. Some of the families in the southwest whose property will be changed to industrial by this plan have lived here for over 50 years. The DEIR hints about a possible change in demographics, but does not deal with any of the ramifications of this change or its effects upon community character. Redevelopment needs to work like in El Cajon-helping people to upgrade their homes instead of displacing them.  
Theresa Acerro  
3730 Festival Court 91911

**AA-1** See Response to Comment M-5 above.

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